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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID J. ENGELMAN,  
RONALD J. ENGELMAN II, AND  
STEVEN RODERICK THOMAS,

Defendants.

) Case No. 3:21-mj-00501-MMS  
)  
) COUNT 1  
) ENTRY TO CLOSED AREA OF  
) BROOKS FALLS IN KATMAI  
) NATIONAL PARK  
) Vio. 36 C.F.R. § 13.1226 and 18  
) U.S.C. § 1865(a)  
)  
) COUNT 2  
) DISORDERLY CONDUCT-  
) CREATING A HAZARDOUS  
) CONDITION IN KATAMAI  
) NATIONAL PARK  
) Vio. 36 C.F.R § 2.34(a)(4) and 18  
) U.S.C. § 1865(a)  
)  
) COUNT 3  
) APPROACHING WITHIN 50 YARDS  
) OF A LARGE MAMMAL IN KATMAI  
) NATIONAL PARK  
) Vio. 36 C.F.R. § 13.1206(a) and 18  
) U.S.C. § 1865(a)

## INFORMATION

The United States Attorney charges that:

### COUNT 1

On or about August 9, 2018, at Brooks Falls on the Brooks River in Katmai National Park, within the District of Alaska, the defendants David J. Engelman, Ronald J. Engelman II, and Steven Roderick Thomas, did enter a closed area of Katmai National Park at the Brooks River, to wit: at the Brooks Falls viewing platform, by departing from an authorized viewing platform and wading into the Brooks River below Brooks Falls.

All of which is in violation of 36 C.F.R. § 13.1226 and 18 U.S.C. § 1865(a).

### COUNT 2

On or about August 9, 2018, at Brooks Falls on the Brooks River in Katmai National Park, within the District of Alaska, the defendants David J. Engelman, Ronald J. Engelman II, and Steven Roderick Thomas, did create a hazardous condition in a closed area of Katmai National Park, to wit: at Brooks Falls, Brooks River, by departing from an authorized viewing platform and wading into the Brooks River below Brooks Falls, when brown bears were feeding on the falls and in the Brooks River below Brooks Falls.

All of which is in violation of 36 C.F.R. § 2.34(a)(4) and 18 U.S.C. § 1865(a)

### COUNT 3

On or about August 9, 2018, at Brooks Falls on the Brooks River in Katmai National Park, within the District of Alaska, the defendants David J. Engelman, Ronald J. Engelman

II, and Steven Roderick Thomas, did approach within 50 yards of large mammals, to wit:  
Brown Bears, at Brooks Falls, Brooks River, within Katmai National Park.

All of which is in violation of 36 C.F.R. § 13.1206(a) and 18 U.S.C. § 1865(a).

Submitted September 22, 2021, at Anchorage, Alaska.

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s/ Steven E. Skrocki  
STEVEN E. SKROCKI  
Assistant U.S. Attorney